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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:	:	Chapter 11
PURDUE PHARMA L.P., *et al*.,	:	Case No. 19-23649 (RDD)
Debtors.[1]	:	(Jointly Administered)

NOTICE OF DEPOSITION
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 30(b)(6)

To: Counsel for Debtors
James McClammy, Esq.
Davis Polk Wardwell
450 Lexington Avenue
New York, NY 10017

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, made applicable herein by Rule 7030 of the Federal Rules of Bankruptcy Procedure, and the Local Rules of the Bankruptcy Court for the Southern District of New York, Purdue Pharma L.P., (the "**Debtors**") shall, within thirty (30) days following entry of an Order

[1] The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors shall include their affiliates and other entities under their control. The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

confirming the Plan (the "Deposition Date"), make available Dr. Richard Fanelli for deposition upon oral examination for seven (7) hours by the NAS Ad Hoc Committee on the subjects identified in 'Schedule A' hereto and in the relevant Order filed in the above-caption matter, **at the offices of Tarter Krinsky & Drogin, 1350 Broadway, New York, NY 10018, commencing at 10a.m., est. on the Deposition Date** , or at such other date and time, and at such other location, as agreed upon by the Parties. The deposition may be taken by stenographic, audio, video, and/or real-time computer means before a duly qualified notary public, or some other officer duly authorized by law to administer oaths pursuant to Fed. R. Civ. P. 28(a). The deposition is being taken for discovery purposes, for use at hearing or trial, or any other purpose permitted under the applicable Federal Rules of Procedure.

In accordance with Rule 30(b)(6) of the Federal Rules of Civil Procedure the Debtors are advised of its duty to designate one or more of its officers, directors, employees, or other persons to testify regarding the matters listed on the attached "Schedule A" and its duty to diligently prepare said designated person(s) to testify about those matters. Debtors have designated Richard Fanelli.

Pursuant to Federal Rule of Civil Procedure 30(b)(2) the deponent should produce all documents which deponent has consulted or reviewed, or plans to consult, in preparation for the deposition and has relied upon or will rely upon for testimony in this matter, no fewer than seven (7) days prior to the date of the deposition.

Any party in the above-referenced matter that wishes to participate in the deposition should contact counsel to the ad hoc committee for NAS Children at 212.355.7200.

Dated: July 30, 2021

New York, New York

Respectfully submitted,

/s/ *Scott S. Markowitz*

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SCHEDULE A

The deponent is expected to appoint and prepare a witness or witnesses pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure who shall testify as to facts known or reasonably available to Debtors relating to the matters identified below:

DEFINITIONS

A. The terms "related to" or "relating to" mean in any way factually or logically pertaining to the matter described thereafter.

B. "Including" shall mean without limitation.

C. "Document" means any document in your custody, possession, or control, including but not limited to, any printed, written, recorded, taped, electronic, graphic, or other tangible matter from whatever source, however produced or reproduced, whether in draft or otherwise, whether sent or received or neither, including the original, all amendments and addenda and any non-identical copy (whether different from the original because of notes made on or attached to such copy or otherwise)

This term shall also include all electronically stored information ("ESI"), including, but not limited to, e-mail messages and associated file attachments (the email "chain"), memos, reports, plain text files, spreadsheets, digital art and photos, presentations and any other data that is created or stored on a computer, computer network, backup tapes or archives, embedded data or files, residual data, copies, clone or temp files, browser created data, computer logs, or other electronic storage media including but not limited to files residing CD-ROMs, DVD-ROMs, MP3 players, smart cell phones, flash memory cards and devices, other archive media and 3rd party storage systems.

MATTERS ON WHICH EXAMINATION IS REQUESTED

1. How Debtors maintain, identify, store, save, retain, archive, delete and dispose of scientific studies they conducted, commissioned, obtained and/or received from third parties.

2. How Debtors maintain, identify, store, save, retain, archive, delete and dispose of scientific studies they conducted or commissioned with third parties and/or non-parties.

3. How Debtors maintain, identify, store, save, retain, archive, delete and dispose of scientific studies submitted to the FDA.

4. How Debtors maintain, identify, store, save, retain, archive, delete and dispose of scientific studies that were not submitted to the FDA.

5. How Debtors maintain, identify, store, save, retain, archive, delete and dispose of their regulatory records.

6. Whether there was, or is currently, a room or space where all regulatory records are maintained, and any index to all contents.

7. When Debtors began keeping electronic or digital (or other media) regulatory records and how Debtors maintain those records today.

8. Debtors' practices and protocols concerning document management of life sciences research; research relating to opioids/synthetic opioids; and including but not limited to Debtors' company core data sheets (including pre-2000 iterations, if any); periodic safety update reports, adverse event reports, literature reviews.

9. The purpose and scope, and origins and evolution, of Debtors' company core data sheets (CCDS).

10. How Debtors' CCDS is updated.

11. How Debtors circulate, maintain and stores its CCDS, PSUR, core data sheets (CDS).

12. The origins, purpose and contents of the 'Central Repository, Stamford, CT'.

13. Whether any repository or facility containing scientific studies (whether or not submitted to a regulatory agency) exists today, or had existed.

14. Knowledge of the reference 'Central Repository, Stamford, CT: Vol 105, VIII'.

15. Information regarding scientific studies and documents regarding pregnancy, lactation and fertility and opioids/synthetic opioids.